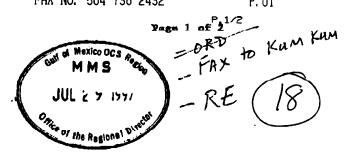
JUL 29 '97 02: 24PM NIPPON OIL EXPL USA



NIPPON OIL EXPLORATION U.S.A. LIMITED SSA7 San Felipe, Suite 2800, Heusten, Taxas 77057 Main (713) 260-7400 • Telecopy (713) 975-7800



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DATE: 07 / 29 / 97 REFERENCE NUMBER: E97 07-160
Chris Oynes - Regional Director TO: Minerals Management Service
FAX NO.: (504) 736 - 2432
FROM: Robert J. Ardell, Executive Vice-President
NO. OF PAGES: 2 (including this sheet)
SUBJECT: MMS Geophysical and Geological (GiG) Rulemaking
On February 11, 1997, MMS proposed to smend the rules dealing with the
collection, processing and disposition of C&G data. After reviewing the
proposed rules changes, Wippon respectfully objects to the proposed changes
Which appear to place an inappropriate burden upon smaller companies, such
as ours, in providing certain information to the MMS.
;
For a complete discussion of the objectionable aspects of the proposed
changes, I lefer you to the starement prepared and sent to you by the
Independent Petroleum Association of America (IPAA), Which statement we
strongly support and endorse.
In addition, we are a relatively small company and do not have the facilities
or personnel which would be necessary in the event we become required to
kemp track everytime seismic data is processed and reprocessed. Burthernore
we have no excess workstations or geophysicists available in the event MAG
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The Par From Paris Orace
Dept / Agency Phone 7 4 734 2589
7502 787 1093 Fax
NSN 7540 01-317-7368 5099 101 GENERAL SERVICES ADMINISTRATION

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· personnel wanted to visit our office to review such data.

In short, we do not believe the MMS has analyzed the possible impacts the proposed changes would have on small businesses such as ours. We hope you will seriously consider our concerns as well as those conveyed to you by IPAA.

Sincerely,

Executive Vice President

FAX NO. 5U4 /36 2432